Osama El-Lissy  
Deputy Administrator  
APHIS PPQ  
Washington DC  

June, 2018  

Dear Mr. El-Lissy,

The Eastern Plant Board is concerned about work plan templates used to support CAPS and Farm Bill funded surveys and projects. The Eastern Plant Board recognizes the need for work plan templates and the complexities of distributing current templates. However, recent requests for states to re-submit work plans on the “approved” template indicate improved guidance and communication may be necessary to streamline the process for states and APHIS PPQ reviewers.

The purpose of providing work plan templates is to simplify the review process for submitters and reviewers alike, and to ensure that the relevant information needed to describe and assess the projects is captured. It is to be expected that adjustments to how this information is collected are necessary. However, when a request is made that a state re-submit a work plan because they have not utilized the current template, this mutual goal to streamline the process is not met. It can be unclear if the request to utilize a new template is made because the states were unaware of or did not utilize the available new template, or because revisions to the template were made after the start of the work plan submittal process. Whatever the cause for the confusion, the goal should be to reduce re-iterative efforts by submitters and reviewers and the Eastern Plant Board has some suggestions as to how this could be accomplished:

- Provide a revision date on the current version of the template. This would make it easy for both the submitter and the reviewer to determine if they are using the current template.
- On the CAPS Resource and Collaboration Site, utilize a “Work Plan Template” menu similar to that for the “Survey Summary Form” and “Farm Bill” menus. Templates are currently separately listed under “Resources” and “Farm Bill”. As data collection through these templates is critical, they should be easily accessible and front facing on the home page, rather than require additional searching.
• The work plan template should be finalized at least one month prior to the start of the submission process. If this deadline is not met, then states utilizing the older template should be informed, but not required, to incorporate revisions during that funding cycle.

Of similar concern is that a survey template is currently being used to collect information about Farm Bill Goal 5 outreach work. Survey and outreach can be very disparate types of projects, and the survey template is not a good fit to capture relevant information about outreach. Survey is a conscripted activity, with specific pests targeted, methods, locations, and materials used. The template used reflects this straightforward approach. Outreach projects, however, should be creative, innovative, and potentially vary widely from one another. The template used to communicate the goals, methods, and potential outcomes of the outreach project should promote rather than stifle creativity. Use of the survey template for outreach projects does not support the narrative description of the outreach effort, nor does it effectively inform the submitter what critical information should be presented to the reviewer. The Eastern Plant Board recommends that the current outreach template be revised for next year’s Farm Bill process. We recommend that APHIS develop a template that better informs the submitter as to the relevant information that should be presented as part of the process, and facilitate open narrative to describe these creative projects. Providing greater outreach-specific guidance in the work plan template will ensure that states are accurately reporting to APHIS their outreach plans and accomplishments.

The Eastern Plant Board supports the use of work plan templates to facilitate project reporting and review. However, we believe that challenges currently exist in ensuring use of the relevant work plan template, and that an outreach-specific template should be provided for Farm Bill Goal 5 projects. The Eastern Plant Board respectfully requests that APHIS PPQ review their process for making and publishing changes to work plan templates and that they redesign the template to be used for Farm Bill Goal 5 projects.

Sincerely,

[Signature]

Chris Logue, President, Eastern Plant Board

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